

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 11
BIG LOTS, INC., <i>et al.</i> , ¹	Case No. 24-11967 (JKS)
Debtors.	(Jointly Administered)
Obj. Deadline October 2, 2024 at 4:00 p.m. (ET)	
Hearing Date: October 9, 2024 at 1:00 p.m. (ET)	

**NOTICE OF MOTION OF SOUTHPOINT PLAZA, L.L.C. AND GKKI, L.L.C (I) TO
COMPEL DEBTORS TO IMMEDIATELY ASSUME OR REJECT A LEASE OF
NON-RESIDENTIAL REAL PROPERTY; (II) COMPEL PAYMENT OF AN
ADMINISTRATIVE EXPENSE CLAIM UNDER 11 U.S.C. § 503(b); AND (III) COMPEL
DEBTORS TO COMPLY WITH THEIR OBLIGATIONS UNDER 11 U.S.C. § 365(d)(3)**

PLEASE TAKE NOTICE that on September 19, 2024, Southpoint Plaza, L.L.C. and GKKI, L.L.C, through undersigned counsel, filed the attached *Motion of Southpoint Plaza, L.L.C. and GKKI, L.L.C (I) to Compel Debtors to Immediately Assume or Reject a Lease of Non-Residential Real Property; (II) Compel Payment of an Administrative Expense Claim Under 11 U.S.C. § 503(b); and (III) Compel Debtors to Comply with Their Obligations Under 11 U.S.C. § 365(d)(3)* (the “Motion”) with United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that responses, if any, to the Motion must be in writing, in conformity with the Federal Rules of Bankruptcy Procedure and the Local Rules of the United States Bankruptcy Court for the District of Delaware, filed with the Bankruptcy Court on or before **October 2, 2024 at 4:00 p.m. (ET)** (the “Objection Deadline”). At the same time, you must also serve a copy of the response upon undersigned counsel:

PLEASE TAKE FURTHER NOTICE THAT a hearing on the Motion will be scheduled for **October 9, 2024 at 1:00 p.m. (ET)** (the “Hearing”) before the Honorable J. Kate Stickles United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 5th Floor, Courtroom #6, Wilmington, Delaware 19801.

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin Granville Road, Columbus, OH 43081.

IF NO OBJECTIONS ARE TIMELY FILED, SERVED, AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN CONNECTION WITH SUCH PLEADINGS WITHOUT FURTHER NOTICE OR HEARING.

Dated: September 19, 2024

MORRIS JAMES LLP

/s/ Carl N. Kunz, III

Carl N. Kunz, III (DE Bar No. 3201)
Christopher M. Donnelly (DE Bar No. 7149)
500 Delaware Avenue, Suite 1500
P.O. Box 2306
Wilmington, DE 19899-2306
Telephone: (302) 888-6800
Facsimile: (302) 571-1750
E-mail: ckunz@morrisjames.com
E-mail: cdonnelly@morrisjames.com

and

UB GREENSFELDER LLP

Randall F. Scherck (admitted *pro hac vice*)
(MO Bar No. 31085)
10 S. Broadway, Suite 2000
St. Louis, MO 63102
Telephone: (314) 516-2623
Facsimile: (314) 241-4245
E-mail: RScherck@ubglaw.com

*Counsel to Southpoint Plaza, L.L.C. and
GKKI, L.L.C.*